REMARKS

Claims 1-33 are currently pending in the application. Claims 1 and 20 have been amended. Applicant respectfully submits that no new matter has been added. Applicant respectfully requests reconsideration of the application in view of the foregoing amendments and the following remarks.

As requested in the Office Action, Applicant has submitted formal drawings.

Claims 1-10 and 20-32 stand rejected for lacking utility under 35 U.S.C. § 101.

Claims 1-10 and 20-32 stand rejected under 35 U.S.C. § 101 as being directed to non-statutory subject matter. Applicant respectfully submits that claims 1-10 and 20-32 as pending prior to this amendment were directed to patentable subject matter. However, in an effort to further prosecution of this application, Applicant has amended claims 1 and 20 in response to the rejection of claim 1-10 and 20-32 as not being directed to statutory subject matter. In particular, claim 1 has been amended to recite that the steps of claim 1 of tracking modifications, storing parameters, first identifying modifications, second identifying modifications, and performing statistical analysis are performed over a computer network. Claim 20 has been amended to recite that the steps of claim 20 of tracking modifications, storing parameters, first identifying modifications, second identifying modifications, and performing statistical analysis are performed over a computer network. Applicant respectfully submits that, even if it is assumed, for the sake of argument, that claims 1 and 20 prior to their amendment herein were not directed to statutory subject matter, each of claims 1 and 20 are now clearly directed to statutory subject matter.

Claims 1-23 and 25-33 stand rejected under 35 U.S.C. § 102(b) as being anticipated by "Measuring and Visualizing Information Transfer in Networked Collaboration," by Rainer Puittinen and Ari-Pekka Hameri ("Puittinen"). Puittinen relates to a set of metrics. The metrics are adapted to help in visualizing the performance of an organization through its electronic communication and behavior. Relying on document usage as a source of raw data, the article presents a model to visualize a true communication network of the organization. A software application using this approach is also presented and the experiences are documented.

Independent claim 1 recites, in part, the features of "forming at least one metric representative of an interdependency relationship between the first and second project team members" and "storing the at least one metric representative of the interdependency relationship."

In contrast to claim 1, Puittinen discloses an information exchange model based on an assumption that documents are the primary sources of information and document usage is a metric for information exchange. *See* Puittinen, page 86, para 4. Puittinen teaches a tool adapted to allow a single engineer to check whether indented people are reading his documents, allowing him to devise an understanding of his vital role in a large-scale effort. The tools enable all parties to check configuration related information and allows collaborations to take place at all levels. *See* Puittinen, page 95, para 4. Puittinen fails to disclose at least one metric representative of an interdependency relationship between a first and a second project team members as claimed.

Furthermore, Puittinen teaches a data storage medium where information is temporarily stored on its way from a producer to a consumer. The information according to Puittinen corresponds to a document. *See* Puittinen, page 87, para 2 and page 87, para 10. However, the stored information does not correspond to at least one metric representative of the interdependency relationship as claimed. Applicant respectfully submits that amended claim 1 distinguishes over Puittinen and is in condition for allowance. Withdrawal of the rejection of amended claim 1 as anticipated by Puittinen is respectfully requested.

Dependent claims 2-10 depend from and further restrict independent claim 1 in a patentable sense. Applicant respectfully submits that, for at least the reasons set forth above with respect to the rejection of independent claim 1, dependent claims 2-10 distinguish over Puittinen and are in condition for allowance. Withdrawal of the rejection of dependent claims 2-10 is respectfully requested.

Independent claim 11 recites, in part, the features of "a statistics analyzer component for statistically analyzing the collected data indicative of the temporal relationship to form at least one metric representative of an interdependency relationship between the first and second project team members" and "a data repository for storing the at least one metric representative of the interdependency relationship between the first and second project team members."

In contrast to claim 11, Puittinen discloses an information exchange model based on an assumption that documents are the primary sources of information and document usage is a metric for information exchange. *See* Puittinen, page 86, para 4. Puittinen teaches a tool adapted to allow a single engineer to check whether indented people are reading his documents, allowing him to devise an understanding of his vital role in a large-scale effort. The tools enable all parties to check configuration related information and allows collaborations to take place at all levels. *See* Puittinen, page 95, para 4. Puittinen fails to disclose at least one metric representative of an interdependency relationship between a first and a second project team members as claimed.

Furthermore, Puittinen teaches a data storage medium where information is temporarily stored on its way from a producer to a consumer. The information according to Puittinen corresponds to a document. *See* Puittinen, page 87, para 2 and page 87, para 10. However, the stored information does not correspond to at least one metric representative of the interdependency relationship as claimed. Applicant respectfully submits that amended claim 11 distinguishes over Puittinen and is in condition for allowance. Withdrawal of the rejection of amended claim 11 as anticipated by Puittinen is respectfully requested.

Dependent claims 12-19 depend from and further restrict independent claim 11 in a patentable sense. Applicant respectfully submits that, for at least the reasons set forth above with respect to the rejection of independent claim 11, dependent claims 12-19 distinguish over Puittinen and are in condition for allowance. Withdrawal of the rejection of dependent claims 12-19 is respectfully requested.

Independent claim 20 recites, in part, the features of "performing a statistical analysis based on the identified modifications to the at least one artifact by the first and second persons, the statistical analysis generating at least one metric indicative of the interdependency relationship between the first and second persons."

In contrast to claim 20, Puittinen discloses an information exchange model based on an assumption that documents are the primary sources of information and document usage is a metric for information exchange. *See* Puittinen, page 86, para 4. Puittinen teaches a tool adapted to allow a single engineer to check whether indented people are reading his documents allowing him to devise an understanding of his vital role in a large-scale effort. The tools enable all parties to check configuration related information and allows collaborations to take place at

all levels. *See* Puittinen, page 95, para 4. Puittinen fails to disclose at least one metric representative of an interdependency relationship between a first and a second project team members as claimed. Applicant respectfully submits that amended claim 20 distinguishes over Puittinen and is in condition for allowance. Withdrawal of the rejection of amended claim 20 as anticipated by Puittinen is respectfully requested.

Dependent claims 21-23 and 25-32 depend from and further restrict independent claim 20 in a patentable sense. Applicant respectfully submits that, for at least the reasons set forth above with respect to the rejection of independent claim 20, dependent claims 21-23 and 25-32 distinguish over Puittinen and are in condition for allowance. Withdrawal of the rejection of dependent claims 21-23 and 25-32 is respectfully requested.

Independent claim 33 relates to a computer-readable medium. Applicant respectfully submits that Puittinen fails to teach, anticipate, or suggest at least one of the distinguishing features of independent claim 33, namely, "statistically analyze the data indicative of the temporal relationship between the first and second project team members" and "form at least one metric representative of an interdependency relationship between the first and second project team members." Additionally, Applicant submits that claim 33 patentably distinguishes over Puittinen for similar reasons to those discussed above with respect to independent claims 1, 11, and 20.

Claim 24 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over Puittinen in view of official notice. Dependent claim 24 depends from and further restricts independent claim 20 in a patentable sense. Applicant respectfully submits that, for at least the reasons set forth above with respect to the rejection of independent claim 20, dependent claim 24 distinguishes over Puittinen and official notice and is in condition for allowance. Withdrawal of the rejection of dependent claim 24 is respectfully requested.

In view of the above amendment, Applicant believes the pending application is in condition for allowance.

Dated: Sept 27, 2005

Respectfully submitted,

By _____
Stanley R. Moore
Registration No.: 26,958
JENKENS & GILCHRIST, A PROFESSIONAL CORPORATION
1445 Ross Avenue, Suite 3700
Dallas, Texas 75202
(214) 855-4500
Attorneys For Applicant

REDLINED COPIES OF DRAWINGS

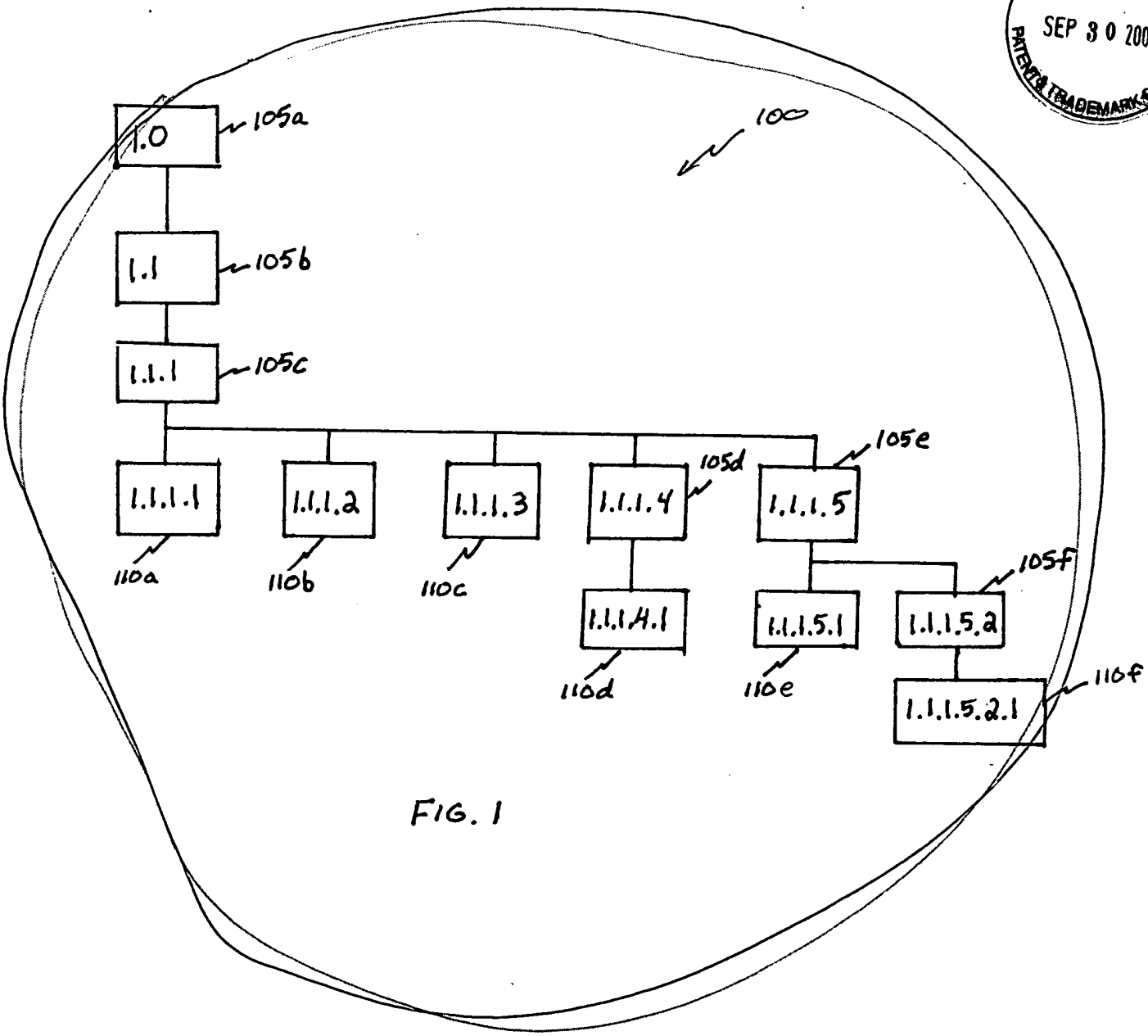

FIG. 1

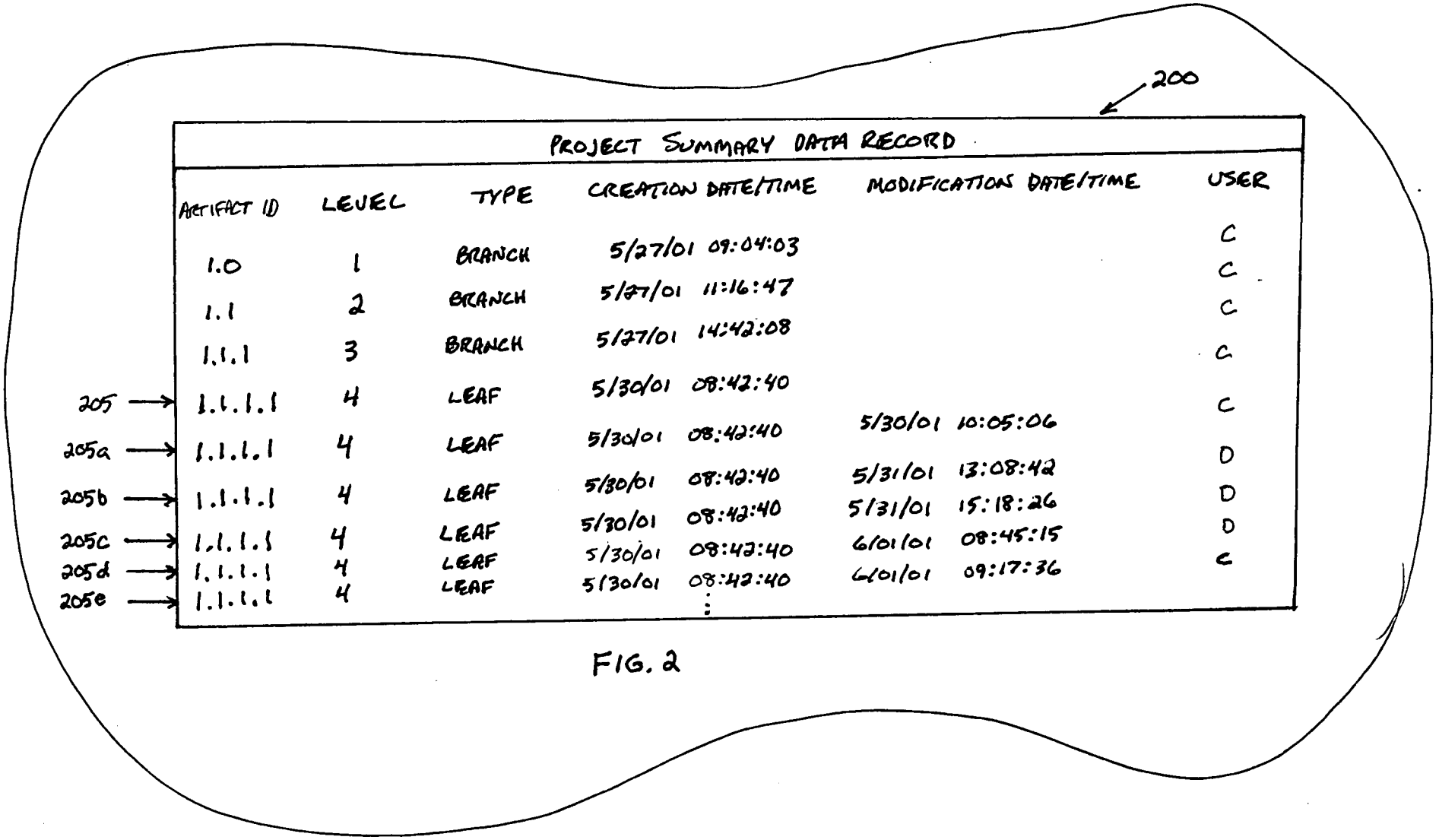
200
PROJECT SUMMARY DATA RECORD
ARTIFACT ID
LEVEL
TYPE
CREATION DATE/TIME
MODIFICATION DATE/TIME
USER
1.0 1 BRANCH 5/27/01 09:04:03 C
1.1 2 BRANCH 5/27/01 11:16:47 C
1.1.1 3 BRANCH 5/27/01 14:42:08 C
205 → 1.1.1.1 4 LEAF 5/30/01 08:42:40 C
205a → 1.1.1.1 4 LEAF 5/30/01 08:42:40 5/30/01 10:05:06 D
205b → 1.1.1.1 4 LEAF 5/30/01 08:42:40 5/31/01 13:08:42 D
205c → 1.1.1.1 4 LEAF 5/30/01 08:42:40 5/31/01 15:18:26 D
205d → 1.1.1.1 4 LEAF 5/30/01 08:42:40 6/01/01 08:45:15 C
205e → 1.1.1.1 4 LEAF 5/30/01 08:42:40 6/01/01 09:17:36

FIG. 2

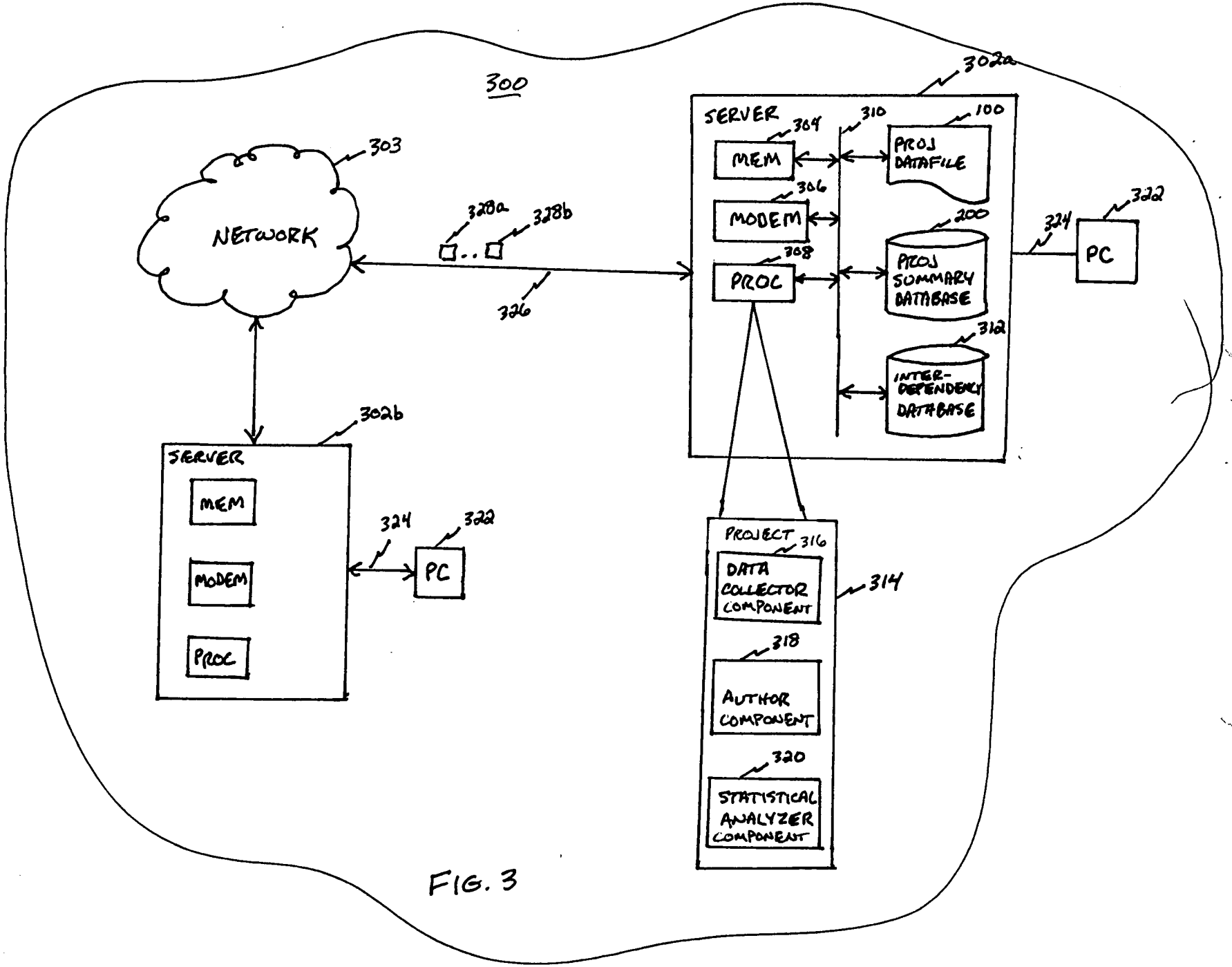
300
302a
SERVER
304
MEM
310
100
PROJ DATAFILE
306
MODEM
200
PROJ SUMMARY DATABASE
308
PROC
312
INTER-DEPENDENCY DATABASE
303
NETWORK
328a
328b
326
322
324
PC
302b
SERVER
MEM
MODEM
PROC
324
322
PC
PROJECT
316
DATA COLLECTOR COMPONENT
314
318
AUTHOR COMPONENT
320
STATISTICAL ANALYZER COMPONENT

FIG. 3

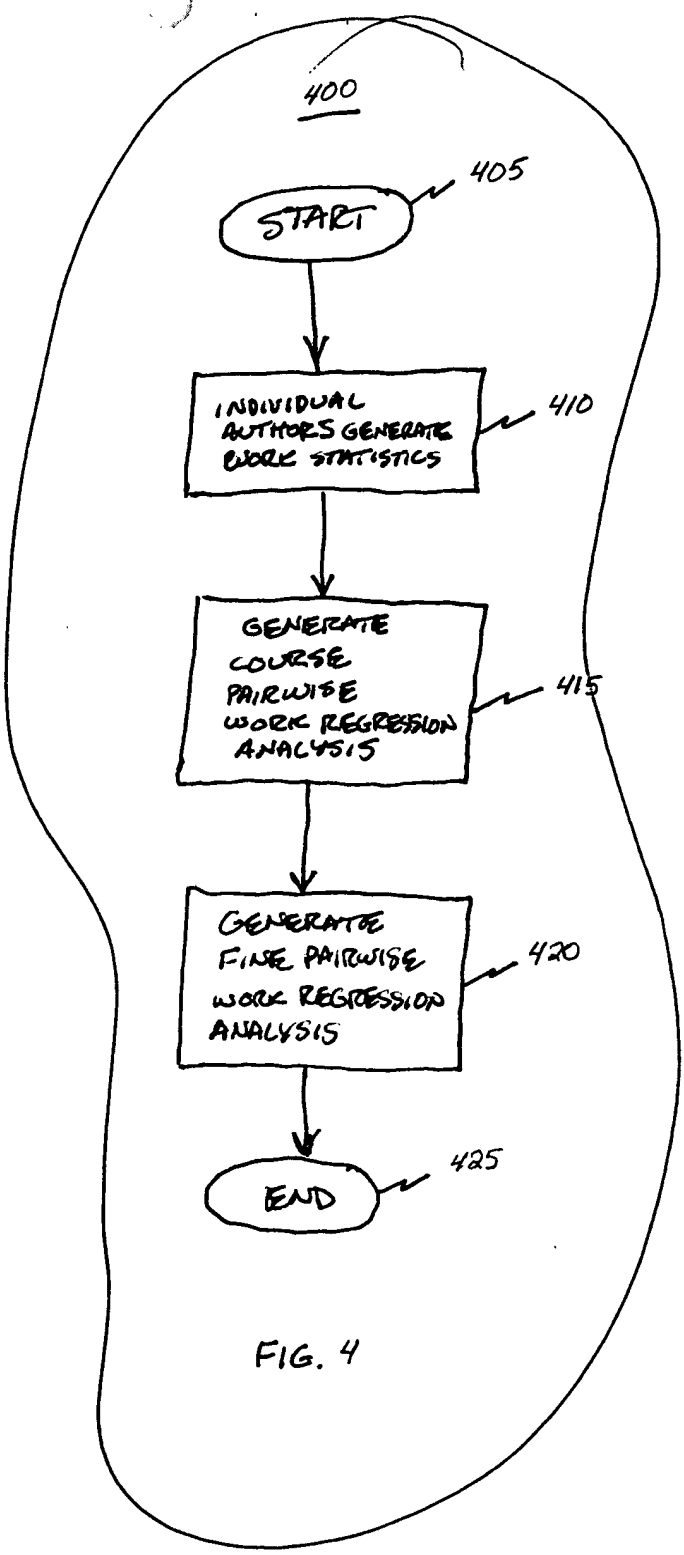
400
405
START
INDIVIDUAL AUTHORS GENERATE WORK STATISTICS
410
GENERATE COURSE PAIRWISE WORK REGRESSION ANALYSIS
415
GENERATE FINE PAIRWISE WORK REGRESSION ANALYSIS
420
END
425

FIG. 4

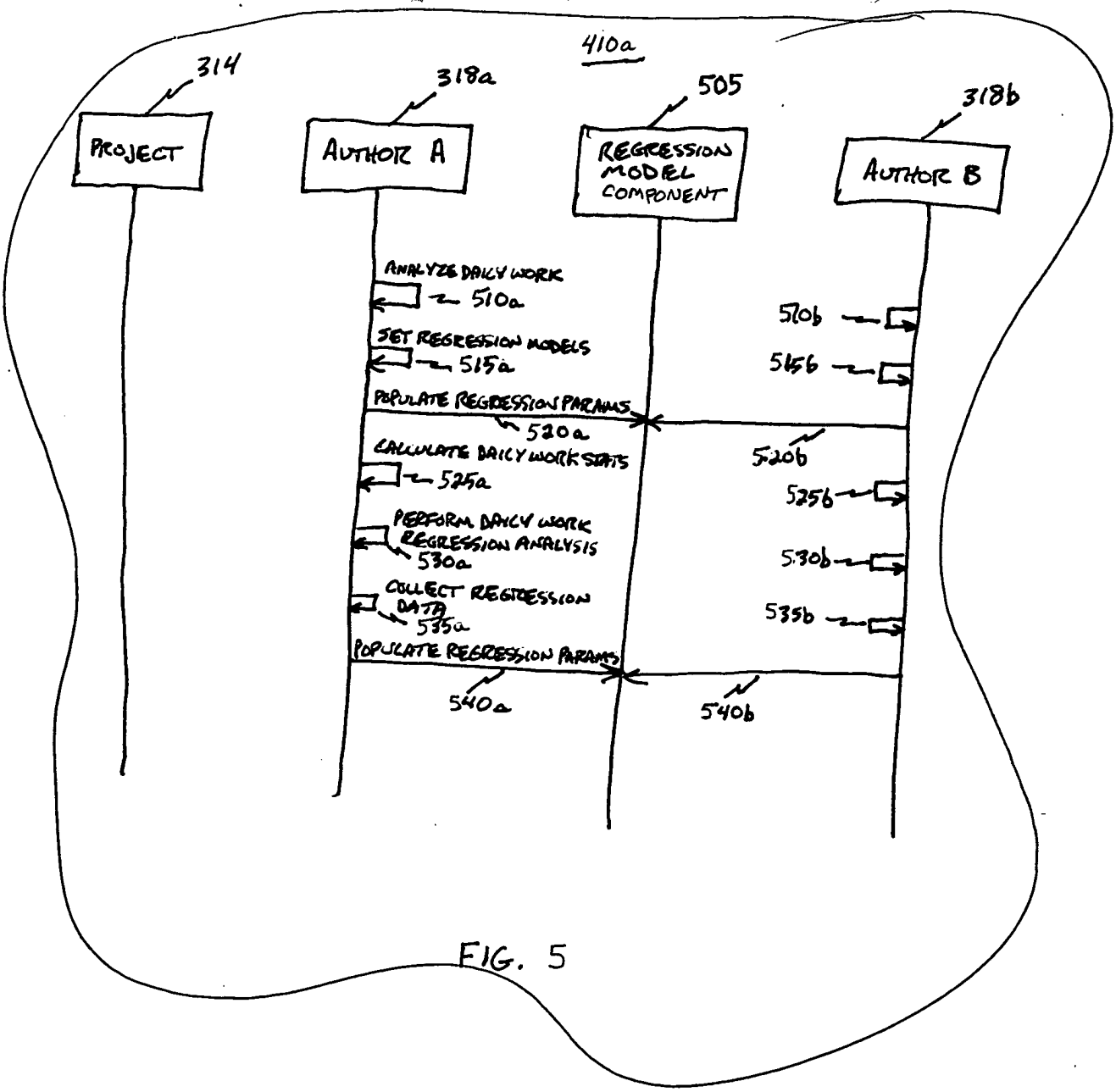
410a
314
318a
505
318b
PROJECT
AUTHOR A
REGRESSION MODEL COMPONENT
AUTHOR B
ANALYZE DAILY WORK
510a
510b
SET REGRESSION MODELS
515a
515b
POPULATE REGRESSION PARAMS
520a
520b
CALCULATE DAILY WORK STATS
525a
525b
PERFORM DAILY WORK REGRESSION ANALYSIS
530a
530b
COLLECT REGRESSION DATA
535a
535b
POPULATE REGRESSION PARAMS
540a
540b

FIG. 5

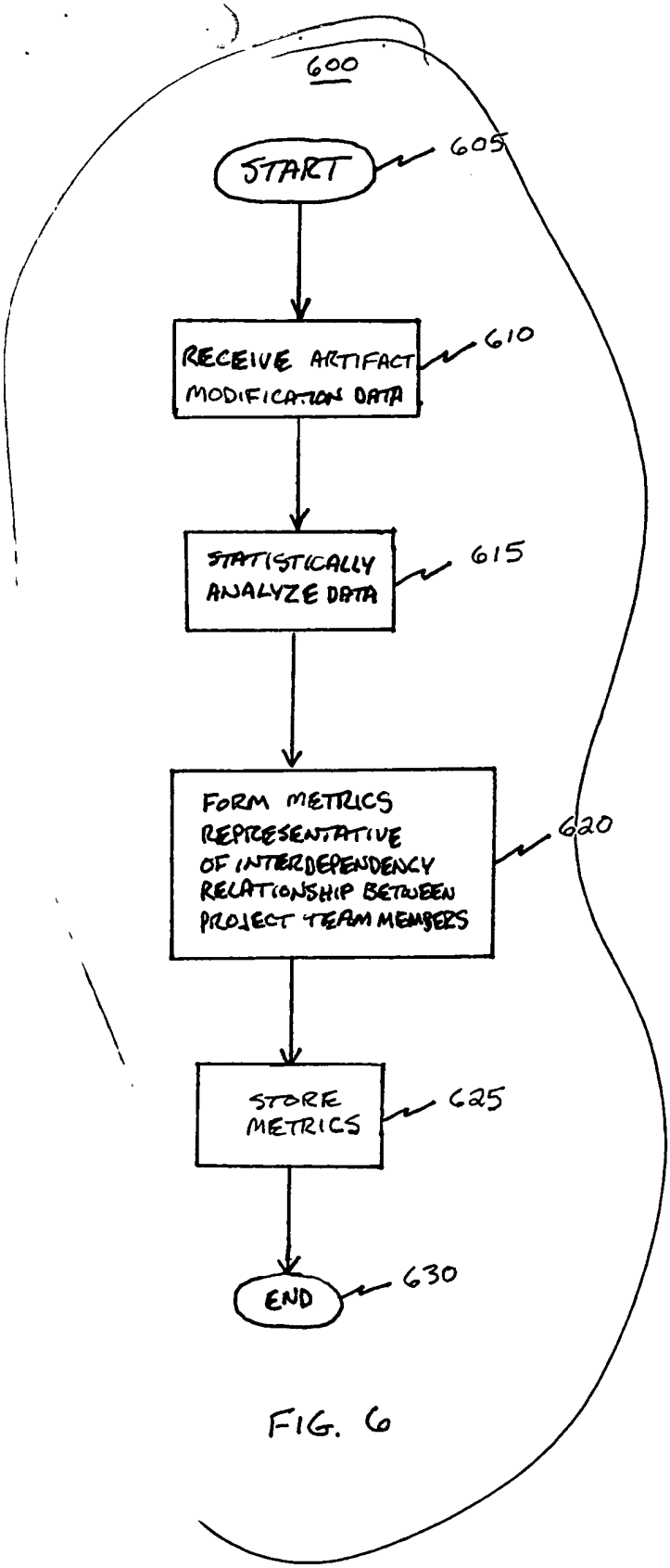
600
START
605
RECEIVE ARTIFACT MODIFICATION DATA
610
STATISTICALLY ANALYZE DATA
615
FORM METRICS REPRESENTATIVE OF INTERDEPENDENCY RELATIONSHIP BETWEEN PROJECT TEAM MEMBERS
620
STORE METRICS
625
END
630

FIG. 6

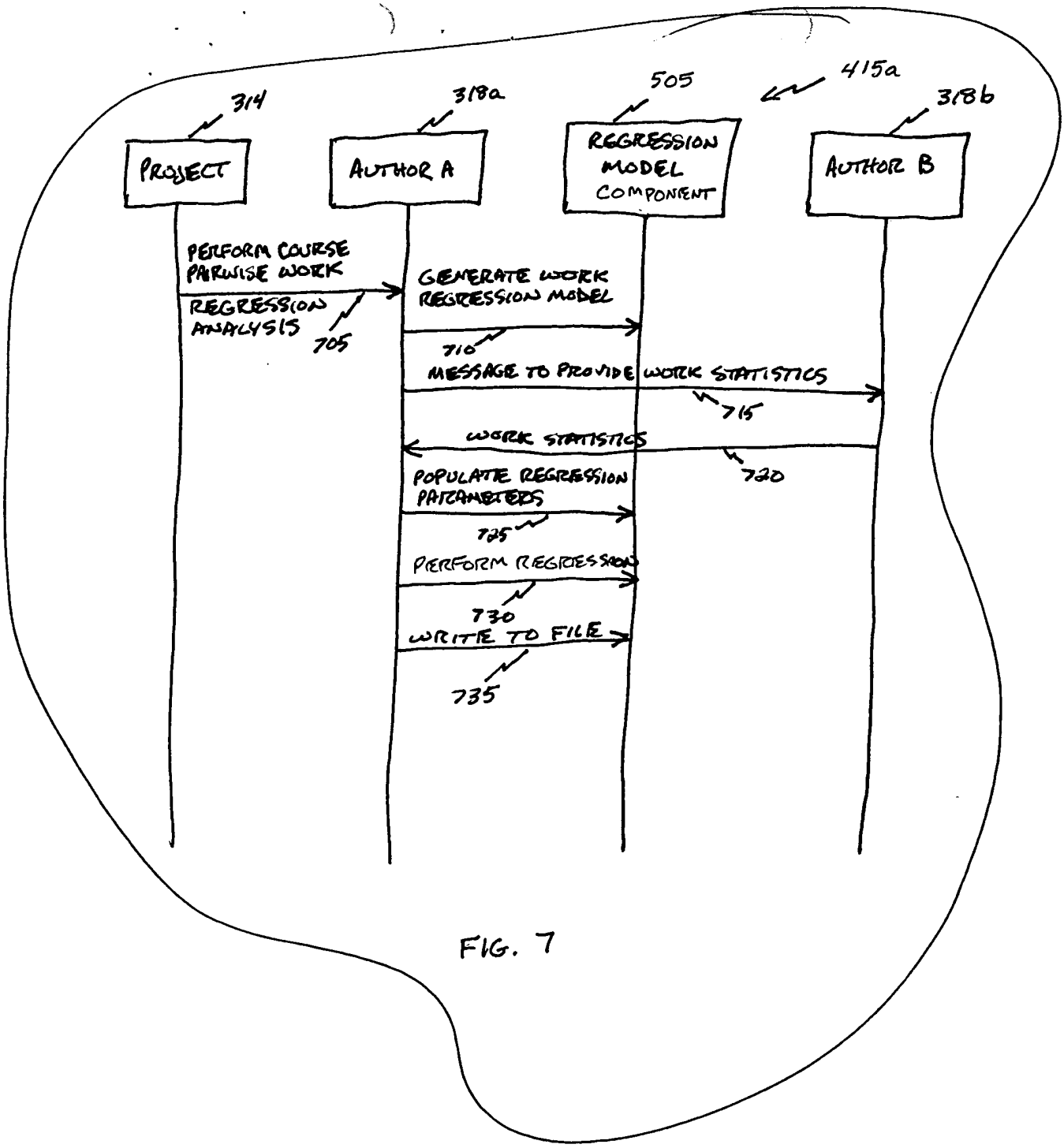
314
318a
505
415a
318b
PROJECT
AUTHOR A
REGRESSION MODEL COMPONENT
AUTHOR B
PERFORM COURSE PAIRWISE WORK
REGRESSION ANALYSIS
705
GENERATE WORK REGRESSION MODEL
710
MESSAGE TO PROVIDE WORK STATISTICS
715
WORK STATISTICS
720
POPULATE REGRESSION PARAMETERS
725
PERFORM REGRESSION
730
WRITE TO FILE
735

FIG. 7

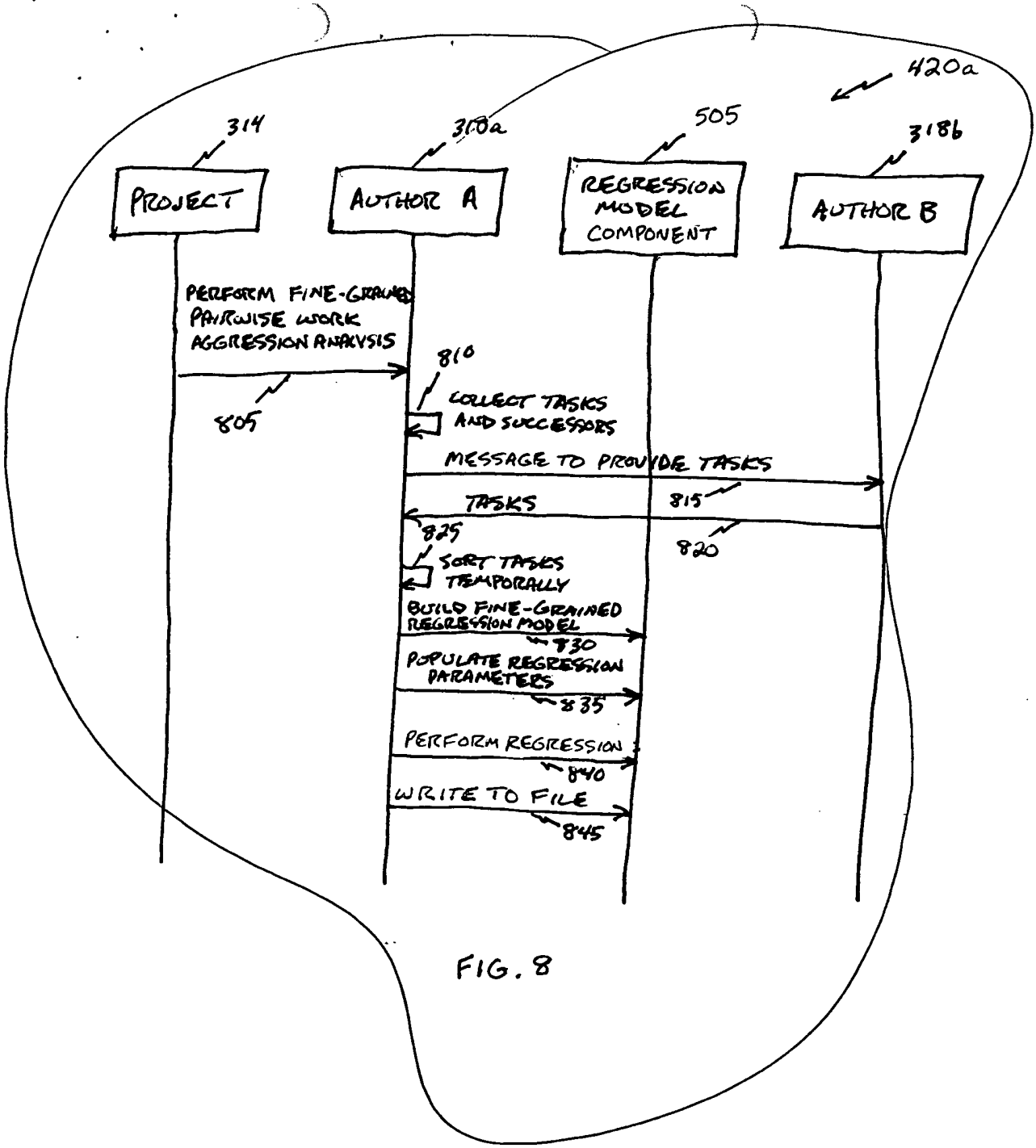
420a
314
310a
505
318b
PROJECT
AUTHOR A
REGRESSION MODEL COMPONENT
AUTHOR B
PERFORM FINE-GRAINED PAIRWISE WORK AGGRESSION ANALYSIS
805
810
COLLECT TASKS AND SUCCESSORS
MESSAGE TO PROVIDE TASKS
TASKS
815
820
825
SORT TASKS TEMPORALLY
BUILD FINE-GRAINED REGRESSION MODEL
830
POPULATE REGRESSION PARAMETERS
835
PERFORM REGRESSION
840
WRITE TO FILE
845

FIG. 8

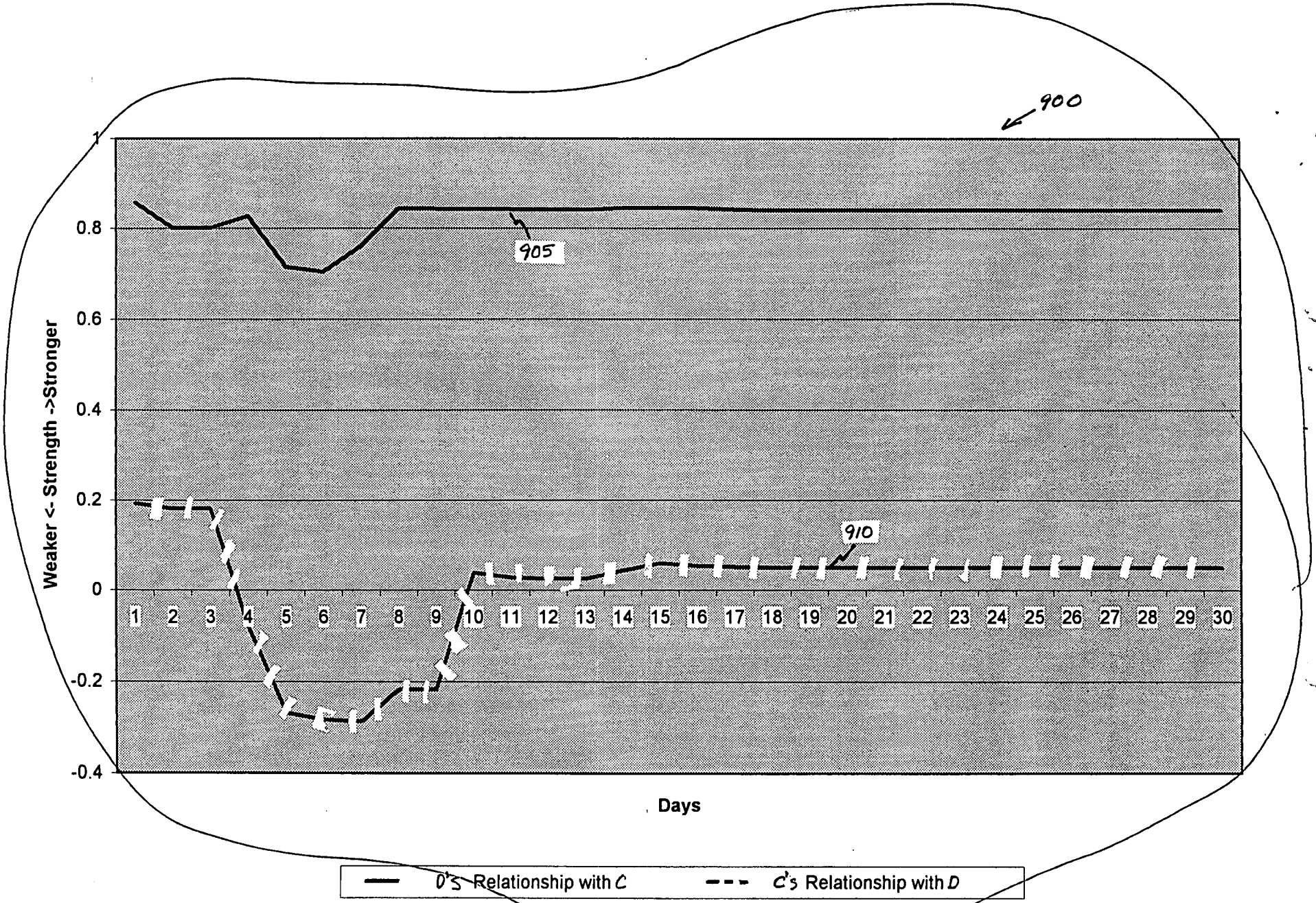

FIG. 9

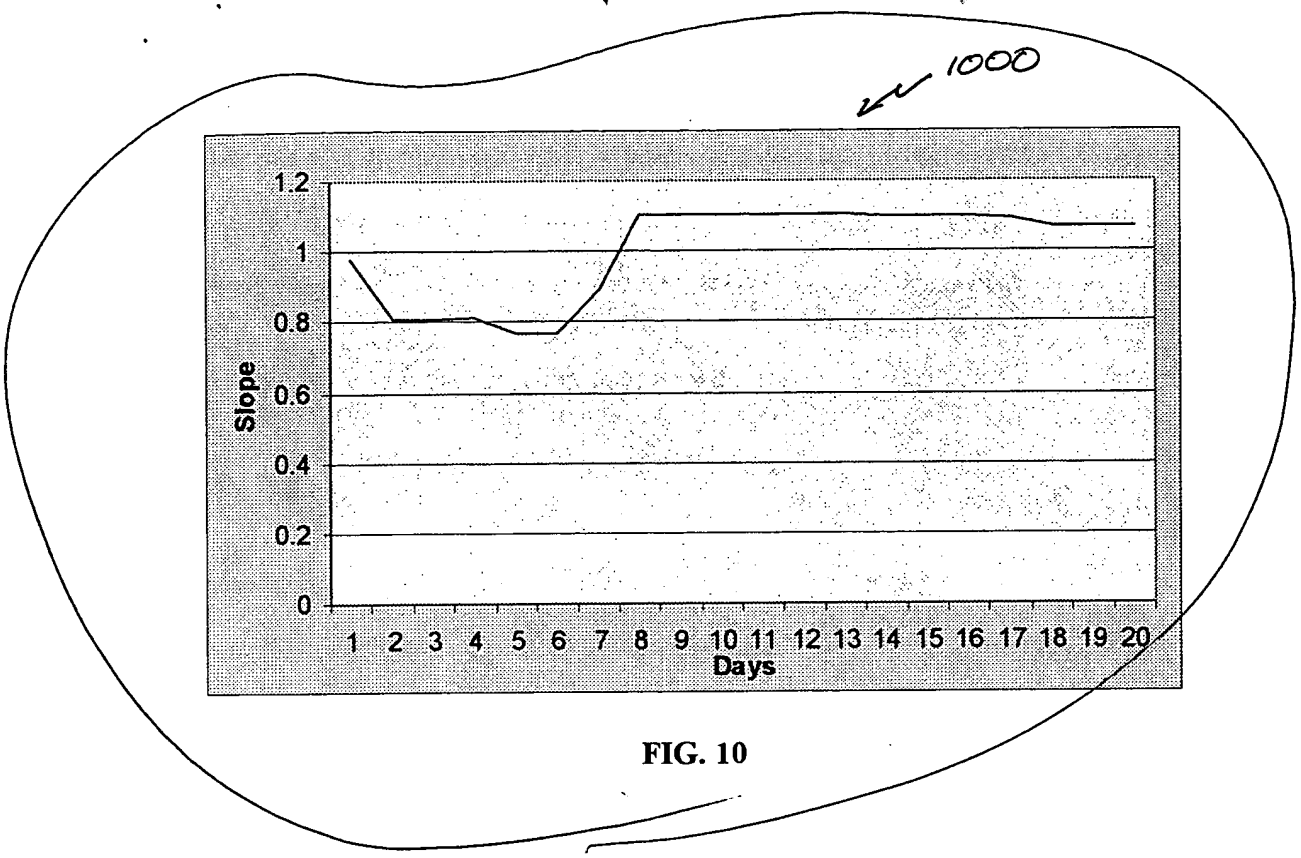

FIG. 10